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**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Debra Morales Ruiz, an individual, for herself and on behalf of and as pending Personal Representative of The Estate of Alexander Chavez; Alex George Chavez, an individual,

No.: CV-23-02482-PHX-KML (DMF)

## **JOINT CASE MANAGEMENT REPORT**

(Assigned to the Honorable Krissa M.  
Lanham and referred to the Honorable  
Deborah M. Fine)

Plaintiffs,  
vs.

County of Maricopa, a governmental entity; Brandon Smith and Jane Doe Smith; Paul Penzone and Jane Doe Penzone; David Crutchfield, an individual; Lisa Struble, an individual; Kyle Moody and Jane Doe Moody; Arturo Dimas and Jane Doe Dimas; Tyler Park and Jane Doe Park; Gerardo Magat and Jane Doe Magat; Daniel Hawkins Jr. and Jane Doe Hawkins; Javier Montano and Jane Doe Montano; James Dailey and Jane Doe Dailey; Trevor Martin and Jane Doe Martin; Greggory Hertig and Jane Doe Hertig; John Chester and Jane Doe Chester; Jorge Espinosa Jr. and Jane Doe Espinosa; Morgan Rainey and John Doe Rainey; Stefanie Marsland and John Doe Marsland; and, John and Jane Does 1-40.

### Defendants.

1 Through counsel undersigned and pursuant to the Court's "Order Setting Rule 16  
2 Case Management Conference" (the "Rule 16 Order"), the parties hereby jointly submit  
3 their Joint Case Management Report as follows:  
4

5 1. Plaintiffs Debra Morales Ruiz, for herself and on behalf, and as pending  
6 Personal Representative of, The Estate of Alexander Chavez Alex George Chavez  
7 (collectively, "Plaintiffs"), and Defendants Maricopa County, Brandon Smith, Paul  
8 Penzone, David Crutchfield, Lisa Struble, Kyle Moody, Arturo Dimas, Tyler Park, Gerardo  
9 Magat, Daniel Hawkins Jr., Javier Montano, James Dailey, Trevor Martin, Gregory Hertig,  
10 John Chester, Jorge Espinosa Jr., Morgan Rainey, and Stefanie Marsland (collectively,  
11 "Defendants"), attended the Rule 26(f) meeting and assisted in developing the Case  
12 Management Report.  
13

14 2. Plaintiffs Debra Morales Ruiz, for herself and on behalf, and as pending  
15 Personal Representative of, The Estate of Alexander Chavez Alex George Chavez  
16 (collectively, "Plaintiffs"), and Defendants Maricopa County<sup>1</sup>, Brandon Smith, Paul  
17 Penzone, David Crutchfield, Lisa Struble, Kyle Moody, Arturo Dimas, Tyler Park, Gerardo  
18 Magat, Daniel Hawkins Jr., Javier Montano, James Dailey, Trevor Martin, Gregory Hertig,  
19 John Chester, Jorge Espinosa Jr., Morgan Rainey, and Stefanie Marsland (collectively,  
20 "Defendants") are the parties remaining in the case.  
21  
22  
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24

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25 <sup>1</sup> Though the Court dismissed Maricopa County from this action without prejudice via  
26 Order entered August 14, 2025, ECF No. 49, *see id.* 16:27-28, Plaintiffs' Motion for  
27 Reconsideration requesting the County's reinstatement on the grounds that it is the proper  
28 defendant for claims against County Health Services ("CHS") remains pending, grounds  
that Defendants' Response concedes without conceding that Plaintiff has stated a claim for  
relief, *see id.* 2:3-12, ECF No. 55.

1       3.     Plaintiffs: This case concerns the death of Plaintiffs' son Alexander Chavez  
2 while in the control, custody, and supervision of Maricopa County and its fellow Defendant  
3 County employees. Mr. Chavez arrived at the Lower Buckeye Jail (the "Jail") on August  
4 5, 2022 and was transported to the hospital on or about August 8, 2022 due to injuries he  
5 suffered under Defendants' lack of care in County facilities. He died from these injuries on  
6 August 12, 2022.

7       Plaintiffs now bring claims against Defendants for: violation of civil rights under  
8 the Fourteenth Amendment and 42 U.S.C. § 1983; negligence, and; gross negligence.

9       Defendants: This case revolves around the death of Plaintiffs' son decedent  
10 Alexander Chavez, who died while in custody at the Maricopa County Jail. Mr. Chavez  
11 was booked into the Maricopa County Jail system on August 5, 2022, and was transported  
12 to the hospital on or about August 8, 2022, following his attempt to take his own life. Mr.  
13 Chavez ultimately passed away from his self-inflicted injuries on August 12, 2022.  
14 Defendants exercised appropriate care over Mr. Chavez during his time in the Maricopa  
15 County Jails. Defendants deny violation of any federal and/or state laws.

16       4.     The United States District Court has original jurisdiction of this civil action  
17 pursuant to 28 U.S.C. § 1441(c), because Plaintiffs allege violations of their civil rights  
18 and have brought claims under 42 U.S.C. § 1983 and the U.S. Constitution.

19       5.     All remaining Defendants have been served and have appeared.

20       6.     At present, none of the parties expects to add additional parties to the case.  
21 Defendants anticipate filing an amended answer should the Court grant Plaintiff's currently  
22 pending Motion for Reconsideration.

1       7. At present, no motions are contemplated.

2       8. The parties anticipate private mediation as opposed to the need for a  
3 Magistrate Judge for the purposes of a settlement conference.  
4

5       9. The parties are unaware of any related cases pending before other courts or  
6 other judges of this Court.

7       10. The parties anticipate that disclosure and discovery in this action will largely  
8 involve electronically stored information (“ESI”), which will largely be exchanged  
9 between them in .pdf format.  
10

11       11. At present, the parties do not anticipate any issues arising regarding claims  
12 of privilege or work product.

13       12. At present, the parties do not believe that an order under Federal Rule of  
14 Evidence 502(d) is warranted in this case.  
15

16       13. Discovery:

17           a. Plaintiffs anticipate seeking discovery relating to topics including but not  
18 necessarily limited to County records pertaining to the decedent’s treatment in its custody  
19 and resulting death, its investigation of same, and its and its employees’ history of  
20 treatment of similarly situated individuals.

22           b. Defendants anticipate discovery related to records specific to Correctional  
23 Health Services and the Maricopa County Sheriff’s Office. These records are expected to  
24 pertain to the care, custody, and control of Mr. Chavez during his incarceration within  
25 MCSO’s jails. This will include any records pertaining to Mr. Chavez’s medical status and  
26 care, investigation into his death, and MCSO and CHS’ practices and procedures.  
27  
28

1           c. At present, the parties do not anticipate the need for any changes to the  
2 discovery limitations proscribed in the Federal Rules of Civil Procedure.

3           d. The parties believe each deposition in this matter should be limited to **5**  
4 hours, and believe each side should be limited to **30** total hours for conducting depositions.

5           14. The parties will exchange Initial Disclosure Statements no later than  
6 **October 15, 2025.**

7           15. The parties propose the following deadlines, which fall on Friday unless  
8 impracticable:

9               a. Fact discovery shall be completed no later than **April 30, 2026**  
10              b. Plaintiffs shall serve any initial expert disclosures no later than **May 31,**  
11             **2026**; Defendants shall serve any initial expert disclosures no later than **June 30, 2026**; the  
12           parties shall serve any rebuttal expert disclosures no later than **July 31, 2026**;

13               c. Any expert depositions shall be completed no later than **August 31, 2026**;  
14              d. The parties shall engage in face-to-face good faith settlement talks no later  
15           than **June 30, 2026**, and;

16               e. Any dispositive motions shall be filed no later than **September 30, 2026**.

17           16. Plaintiffs have requested a jury trial, and Defendants have not contested that  
18 request.

19           17. The parties are hopeful that a private mediation may promote a settlement of  
20 this matter.

1       18. At present, the parties are unaware of any other existing matters that would  
2 aid the Court and parties in resolving this case in a just, speedy, and inexpensive manner  
3 as required by Federal Rule of Civil Procedure 1.

**RESPECTFULLY SUBMITTED** this 22nd day of September 2025.

**MILLS + WOODS LAW, PLLC**

By /s/ Sean A. Woods

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By /s/ Courtney R. Glynn (w/ permission)  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ Ben Dangerfield